

**Declaration of Margaret A. Keeley, Esq.**

1. I am an attorney for Western Services Corporation and George Utmel (collectively, "Western"), and submit the following declaration based upon my personal knowledge.

2. When Western first noted the depositions of Messrs. Malkin and Rakitin to take place in Baltimore, Maryland, Kurchatov's counsel, Jesse Hammock, Esq. of Ober, Kaler, Grimes & Shriver, objected, stating that the depositions should occur in Russia, where Messrs. Malkin and Rakitin reside.

3. In order to avoid involving the Court in this dispute, and to expedite the scheduling of Messrs. Rakitin and Malkin, Western offered to pay for the witnesses to travel to the United States for their July 14-17 depositions.

4. Kurchatov's counsel, Mr. Hammock, accepted this offer, and confirmed the July dates in a telephone conversation with me.

5. On June 13, 2003 counsel for Kurchatov wrote Western to inform it that in fact neither Mr. Malkin nor Mr. Rakitin was available to be deposed any time during the month of July, but that each would be available in August. Exhibit ("Ex.") 4. Mr. Hammock informed me by phone that when Messrs. Malkin and Rakitin confirmed their availability on the *July* 14-18 dates, they mistakenly believed they were confirming for *August* 14-18.

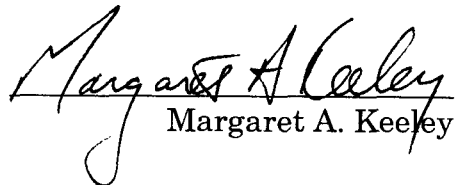
6. Western accepted this change in scheduling, and requested that the depositions go forward August 11-14. Ex. 5.

7. Mr. Hammock called me on or about June 18, 2003, and informed me that August 11-14 would not work because although Messrs. Malkin and Rakitin would be available, Mr. John Murphy, Esq. intended to defend the depositions, and would not be available that week.

8. In a phone conversation with Mr. Hammock on Saturday, June 21, 2003, I tried to find dates agreeable to all parties one more time, and suggested any four days during the week of July 28, or two days during the week of July 28 and two days during the week of August 4. Mr. Hammock stated that he would have to check with Messrs. Rakitin and Malkin, but that the dates appeared to work for counsel.

9. On July 1, 2003, Mr. Hammock left me a voicemail stating that Messrs. Malkin and Rakitin would be available the last week of July 2003, but that each would be available only one day – suggesting Wednesday and Friday of that week.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on July 2, 2003.

  
Margaret A. Keeley